

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

ORIGINAL

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CHIEF CLERK'S OFFICE

Illinois Bell Telephone Company :

Complainant, :

vs. :

Docket No. 03-0194

MCI WorldCom Communications, Inc., :

Respondent. :

VERIFIED ANSWER AND AFFIRMATIVE DEFENSES
OF MCI WORLDCOM TO COMPLAINT

NOW COMES MCI WorldCom Communications, Inc. (referred to as "MCI"), by and through one of its attorneys, and for its answer to the Verified Complaint filed by Illinois Bell Telephone Company ("SBC") in the above captioned proceeding ("SBC's Complaint" or "complaint") states as follows:

1. MCI admits the allegations of paragraph 1 of the complaint.
2. MCI admits the allegations of paragraph 2 of the complaint.
3. MCI admits the allegations of paragraph 3 of the complaint.
4. MCI admits the allegations of paragraph 4 of the complaint.
5. MCI admits in part, and denies in part, the allegations of paragraph 5 of the complaint. MCI admits the existence and validity of Attachment 1, Attachment 2, Attachment 3, and Attachment 4 which are attached to the complaint. MCI denies SBC's characterization of Attachment 4, and the wording of this Attachment 4 is self evident.

6. MCI denies the allegations of paragraph 6 of the complaint.
7. MCI denies the characterization of the EA Agreement in paragraph 7 as the allegations are incomplete, and the terms of the EA Agreement are self evident.
8. MCI denies the characterization of the EA Agreement in paragraph 8 as the allegations are incomplete or inaccurate, and the terms of the EA Agreement are self evident.
9. MCI denies the characterization of the EA Agreement in paragraph 9 as the allegations are incomplete or inaccurate, and the terms of the EA Agreement are self evident.
10. MCI denies the characterization of the EA Agreement in paragraph 10 as these allegations are unduly vague, incomplete or inaccurate, and the terms of the EA Agreement are self evident.
11. MCI admits the first sentence of paragraph 11. MCI admits the existence of Attachment 5 and the words of that attachment are self-evident. MCI denies the second, third, fourth and seventh sentences of paragraph 11 as these allegations are inaccurate and incomplete. MCI admits the fifth and sixth sentences of paragraph 11.
12. MCI admits the second sentence of paragraph 12. MCI denies the first, third, fourth and fifth sentences of paragraph 12 as these allegations are inaccurate and incomplete.
13. MCI denies paragraph 13 as the allegations are inaccurate and incomplete.
14. MCI denies paragraph 14 as these allegations are inaccurate and incomplete.
15. MCI admits that Attachment 6 and Attachment 7 are correct copies of the depicted correspondence. The contents of Attachments 6 and 7 are self evident. MCI denies the remaining allegations of paragraph 15 as the allegations are inaccurate and incomplete.

16. MCI denies paragraph 16 as the allegations are inaccurate and incomplete.

17. MCI admits that Attachment 8 and Attachment 9 are correct copies of the depicted correspondence. The contents of Attachments 8 and 9 are self evident. MCI denies the remaining allegations in that SBC has not accurately and completely summarized these attachments in its allegations in Paragraph 17.

18. MCI admits that Attachment 10, 11, and 12 are correct copies of the depicted correspondence. MCI admits that the parties have remained far apart in their positions. MCI denies the remaining allegations of Paragraph 18 as the allegations are not accurate and complete.

19. MCI denies the allegations of Paragraph 19.


AFFIRMATIVE DEFENSES

For its affirmative defenses in this matter, and without prejudice to its other denials as set forth above, MCI states as follows:

1. This Commission lacks jurisdiction over the present proceeding.
2. MCI reserves its right to assert additional or further affirmative defenses as may be appropriate.

Respectfully submitted,

MCI WorldCom Communications, Inc.

By: 
James R. Denniston
205 North Michigan Avenue
Suite 1100
Chicago, IL 60601
Phone: 312-260-3190
Fax: 312.470.5571
e-mail: James.Denniston@wcom.com

One of Its Attorneys

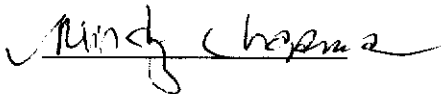
Dated: April 9, 2002

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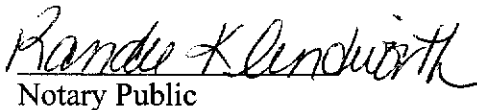
VERIFICATION

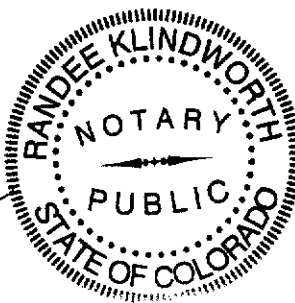
I, Mindy Chapman, Director of LEC Interface Compliance of MCI WorldCom Communications, Inc., state that I have read the foregoing Verified Answer of MCI WorldCom Communications, Inc., and know the contents thereof, and that the same are true to the best of my knowledge, information, and belief.



Mindy Chapman

Subscribed to and sworn
to before me this 8th day
of April 2003.


Notary Public



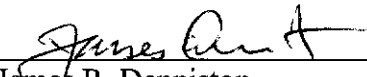
MY COMMISSION EXPIRES 11/18/2003

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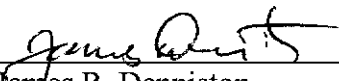
NOTICE OF FILING

Please take notice that on April 9, , 2003, I caused to be sent by Federal Express Next Business Day Delivery, postage prepaid, an original and two copies of the attached pleadings in the above-captioned matter to the Chief Clerk of the Illinois Commerce Commission, Elizabeth A. Rolando, 527 E. Capitol, Springfield, Illinois 62701.


James R. Denniston

CERTIFICATE OF SERVICE

I, James R. Denniston, certify that I caused to be served from MCI WORLDCOM, Inc.'s Chicago, Illinois offices a copy of the attached pleadings in the above-captioned docket, together with a Notice of Filing, upon all parties on the attached service list on the 9th day of April 2003 by e-mail and Federal Express next business day delivery, postage prepaid.


James R. Denniston

James R. Denniston
205 North Michigan Avenue, Suite 1100
Chicago, Illinois 60601
(312) 260-3190

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Service list

Mark A. Kerber
Counsel
Illinois Bell Telephone Company
225 W. Randolph St., 25D
Chicago, IL 60606
E-Mail: mark.a.kerber@ameritech.com

James R. Denniston
Senior Counsel
MCI WorldCom Communications, Inc.
205 North Michigan Ave.
Suite 1100
Chicago, IL 60601
E-Mail: James.Denniston@wcom.com

Administrative Law Judge David Gilbert
Illinois Commerce Commission
State of Illinois Building
160 North LaSalle Street
Suite C-800
Chicago, IL 60601
E-Mail: dgilbert@icc.state.il.us